

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity
as trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

C.A. No. 1:22-cv-01621-MN

UNOPPOSED MOTION TO FILE UNDER SEAL

In the current absence of a Protective Order in this case, Defendant Olivier Amar respectfully moves this Court for an Order authorizing Olivier Amar to file under seal Exhibit 1 to his Opening Brief in Support of his Motion to Dismiss the Plaintiff's Complaint. Exhibit 1 contains non-public information regarding JPMorgan Chase Bank N.A.'s merger with TAPD, Inc. A redacted version of Exhibit 1 will be filed within 7 days.

Pursuant to D. Del. L.R. 7.1.1, Mr. Amar's counsel confirms that he has contacted counsel for the other parties with respect to the issues set forth in this motion. Counsel for the other parties have indicated that they do not oppose the filing of Mr. Amar's Motion to Seal.

Respectfully Submitted,

KOBRE & KIM LLP

Dated: February 28, 2023

/s/ Jacob R. Kirkham

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